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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Juvilene De Leon,

Plaintiff,

v.

Clarity Services, Inc.,

Defendant.

Case No.: 2:25-cv-00746

**Unopposed Motion for Extension of
Time for Clarity Services, Inc. to Answer
(First Request)**

Juvilene De Leon (“Plaintiff”), hereby files this Unopposed Motion for Extension of Time for Clarity Services, Inc. (“Defendant”) to Answer and in support states:

1. On May 6, 2025, Defendant was served with Plaintiff’s Complaint for Damages under the FCRA, 15 U.S.C. § 1681 (“Complaint”).
2. Accordingly, Defendant’s responsive pleading to the Complaint is due on May 27, 2025.
3. Defendant’s counsel has requested more time to complete their investigation of the Plaintiff’s claims and Defendant’s possible defenses.
4. In addition, Plaintiff and Defendant are actively engaged in case-resolution negotiations.
5. Plaintiff does not oppose an extension of Defendant’s time to respond to the Complaint so Defendant’s counsel may complete its investigation into Plaintiff’s claims and the parties may continue to devote their energies to resolving this matter.

- 1 **6.** Therefore Plaintiff respectfully requests the Court for an extension of time for Defendant to
2 file its responsive pleading by 45 days, which is up to and including **July 11, 2025**.
- 3 **7.** This motion is filed in good faith and not for delay.
- 4 **8.** This is the first request for an extension of time for Defendant to answer the complaint and
5 the requested extension does not prejudice the parties.
- 6 **9.** For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date
7 by which Defendant must answer or otherwise respond to Plaintiff's Complaint to **July 11,**
8 **2025.**

9 DATED May 27, 2025.

10 Respectfully submitted,

11 **FREEDOM LAW FIRM**

12 /s/ George Haines
13 George Haines, Esq.
14 Gerardo Avalos, Esq.
15 8985 S. Eastern Ave., Suite 100
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17 Counsel for Plaintiff

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20 **GOOD CAUSE SHOWN, IT IS SO ORDERED:**

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23 Hon. Maximiliano E. Couvillier III
24 United States Magistrate Judge
25 DATED: 5/30/2025

